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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CORA CURRIER,

Plaintiff,

V.

DEPARTMENT OF HOMELAND SECURITY,
DEPARTMENT OF STATE,
DEPARTMENT OF JUSTICE, and
DEPARTMENT OF DEFENSE

Defendants.

Case No. 3:17-cv-01799-JSC

JOINT STATUS REPORT

Date: October 26, 2017
Time: 1:30 p.m.
Place: Courtroom F, 15th Floor
Magistrate Judge Jacqueline Scott Corley

Plaintiff Cora Currier and Defendants—the Department of State (DOS), the Department of Justice (DOJ), the Department of Defense (DOD), and the Department of Homeland Security (DHS)—respectfully submit this Joint Status Report pursuant to the Court’s Minute Order of September 28, 2017 [ECF No. 33].¹

1. This case arises from multiple Freedom of Information Act (FOIA) requests submitted by Plaintiff, dated February 1, 2017, and April 3, 2017. The requests seek records from the four defendant agencies, including from multiple offices and/or sub-agencies within them.

2. The parties have been filing periodic joint status reports and participating in period status conferences since the Court denied Plaintiff's Motion for Preliminary Injunction on August 24, 2017. The parties also have been conferring about the scope and prioritization of Plaintiff's FOIA requests.

¹ The components of DOJ and DHS that are processing Plaintiff's requests are: (1) the Executive Office for United States Attorneys ("EOUSA"); (2) the Federal Bureau of Investigation ("FBI"); (3) the Office of Legal Counsel ("OLC"); (4) the Office of Information Privacy ("OIP"); (5) the U.S. Marshals Service ("USMS"); (6) the DHS Privacy Office ("DHS-PRIV"); (7) U.S. Customs and Border Protection ("CBP"); and (8) DHS's Office of the Inspector General ("DHS-OIG").

1 3. Updates since the last joint status conference, held on September 28, 2017, are below.

2 **Production Updates and Status**

3 4. DOJ-EOUSA: Interagency review of records from EOUSA remains ongoing. These
4 records require review by multiple agencies. EOUSA has received responses from DHS-CBP, DHS-
5 PRIV, and DOJ's Criminal Division. Consultations with DOJ-OIP and the Civil Division of DOJ
6 remain outstanding. Although the timing of the consultations depends on factors outside EOUSA's
7 control, EOUSA anticipates that EOUSA's processing of Plaintiff's FOIA requests to EOUSA will be
8 completed by the end of the calendar year.

9 5. DOJ-OLC: Since the parties' last joint status report, OLC has completed its initial
10 manual responsiveness review and deduplication of the potentially responsive records that it has not
11 already released to Plaintiff. This review reduced the volume of potentially responsive records requiring
12 further review for responsiveness and potential withholdings from over 26,000 documents to
13 approximately 4,800 documents. As previously indicated, OLC anticipates beginning rolling
14 productions of the remaining records no later than October 31, 2017, and commits to rolling productions
15 on approximately a monthly basis thereafter.

16 6. DOJ-OIP: OIP has now completed its initial manual responsiveness review of over
17 16,500 potentially responsive documents collected in response to Plaintiff's FOIA requests to OIP.
18 Following this review, approximately 2,000 documents are still considered potentially responsive and
19 require further review for responsiveness and potential withholdings. OIP anticipates making its next
20 production by the end of this week. OIP also is actively reviewing records received from other agencies
21 in response to requests for interagency review.

22 7. DOD: DOD made a release on October 3, 2017. DOD anticipates making its next
23 release shortly.

24 8. DOS: DOS is making rolling releases on approximately a monthly basis. Since the last
25 status conference, DOS made a release on October 10, 2017. For that release, DOS processed over 300
26 pages, which resulted in 34 pages being released in full or in part.

27 9. DHS-PRI: DHS-PRI is making rolling releases on approximately a monthly basis.
28 Since the last status conference, DHS-PRI made a release on October 16, 2017. For that release, DHS-

1 PRIV reviewed 522 pages, resulting in 30 pages being released in full, 106 pages being released in part,
2 42 pages being withheld in full, and 276 pages being deemed duplicative or non-responsive. DHS-PRIV
3 also sent 68 pages of records to other agencies for interagency review.

4 10. DHS-CBP: DHS-CBP is making rolling productions on approximately a monthly basis.
5 Since the last status report, CBP made a release on October 24, 2017, releasing 250 pages in full or in
6 part and withholding 19 pages in full.

7 11. The status for DOJ-USMS, DHS-OIG, and DOJ-FBI remains unchanged from the
8 parties' last joint status report.

9 Date: October 25, 2017

Respectfully submitted,

10 CHAD A. READLER
11 Acting Assistant Attorney General

12 BRIAN STRETCH
13 United States Attorney

14 ELIZABETH J. SHAPIRO
15 Deputy Branch Director

16 _____
17 /s/ *Matthew J. Berns*
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2 **LOCAL RULE 5-1(i) ATTESTATION**
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5 I certify that I have obtained Matthew J. Berns's concurrence in the filing of this document.
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10 */s/ Marcia Hofmann* _____
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